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Before the  
**Federal Communications Commission**  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Federal-State Joint Board on ) CC Docket No. 96-45  
Universal Service )

**RESPONSES OF BELL ATLANTIC<sup>1</sup> TO DATA REQUESTS**

The Commission has required Bell Atlantic<sup>2</sup> to respond to a number of data requests in connection with its universal service proceeding.<sup>3</sup> These requests are designed to assist the Commission in selecting a forward-looking cost mechanism for use in calculating support for non-rural local exchange carriers serving rural, insular and high-cost areas.<sup>4</sup> Bell Atlantic submitted its initial set of responses on August 15, 1997. This filing provides the requested data for each of the responses for which the Commission extended the response date

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<sup>1</sup> The Bell Atlantic telephone companies ("Bell Atlantic") are Bell Atlantic-Delaware, Inc.; Bell Atlantic-Maryland, Inc.; Bell Atlantic-New Jersey, Inc.; Bell Atlantic-Pennsylvania, Inc.; Bell Atlantic-Virginia, Inc.; Bell Atlantic-Washington, D.C., Inc.; Bell Atlantic-West Virginia, Inc.; New York Telephone Company; and New England Telephone and Telegraph Company.

<sup>2</sup> This response includes information concerning the former NYNEX telephone companies, which have merged with Bell Atlantic.

<sup>3</sup> **Order**, DA 97-1433 (rel. July 9, 1997) ("Order").

<sup>4</sup> **Id.** at ¶1. In responding to this request, Bell Atlantic does not waive its position that the Commission should use actual costs, rather than hypothetical forward-looking costs, in determining the cost of providing telephone service for calculated high-cost support.

until September 12, 1997.<sup>5</sup> It also contains revised figures for several of the responses that were submitted on August 15, 1997.<sup>6</sup>

As contemplated in the Order,<sup>7</sup> the responses to several of the data requests contain confidential information that is routinely withheld from public inspection pursuant to the Freedom of Information Act<sup>8</sup> and the Commission's Rules.<sup>9</sup> The requests for which confidential treatment is requested are listed below, together with the justification required by the Rules.<sup>10</sup> As the Order requires, attached is a "Designation of Confidential Information" form signed by an officer of Bell Atlantic, certifying that the information cited below is confidential.<sup>11</sup>

The information listed below consists of trade secrets and commercial or financial information that is protected by law from public disclosure.<sup>12</sup>

1. Data Request No. 9, Multi-line Residential Customers. This question asks for the number of multi-line residential customers both by study area and by wire center. This information would enable a competitor to target its facility construction and residential service marketing to areas with the highest concentrations of multiple line customers and avoid those in which residential customers generally subscribe to a single line. It is, therefore, competitively-sensitive and should be withheld from public inspection.

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<sup>5</sup> *Order*, DA 97-1728 (rel. Aug. 14, 1997).

<sup>6</sup> Revised figures are provided for Data Request Nos. 1, Loops; 2, Loop Length Studies; 4, Basic Residential Service Offerings; 12, Digital Switches; 19, Miles Served by Wire Center; and 20, Cost of Land and Buildings.

<sup>7</sup> *Order* at ¶ 8.

<sup>8</sup> 5 U.S.C. § 552(b).

<sup>9</sup> 47 C.F.R. § 0.457.

<sup>10</sup> 47 C.F.R. § 0.459.

<sup>11</sup> *See Order* at ¶ 8.

<sup>12</sup> *See* 5 U.S.C. § 552(b)(4), 47 C.F.R. § 457(d).

2. Data Request No. 11, Detailed Continuing Property Records. This request asks for detailed records of electronic switching investment by wire center and for each equipment category. This information will enable a competitor to ascertain the cost of the equipment in a wire center and the planned types of services, supported by the equipment, that Bell Atlantic intends to offer. This information will disclose Bell Atlantic's marketing and service deployment plans in each wire center well before those plans are made public. This information will, in turn, enable competitors to target facility construction and marketing of certain services to areas where Bell Atlantic expects large numbers of customers to subscribe to its innovative new services. In addition, the information would enable competitors to ascertain the price paid for items of central office equipment. The prices and terms of equipment purchases are confidential information that a competitor could use in purchasing its own equipment or pricing its own services. In addition, under contracts with its equipment vendors, Bell Atlantic is prohibited from disclosing publicly the price paid for that equipment. Accordingly, the information requested is competitively-sensitive and should be withheld from public inspection.

3. Data Request No. 14, Digital Line Carrier Devices. This request asks for the costs of each such device purchased during 1995 and 1996 and the number of lines served by each at the end of twelve months in service. Under contracts with its equipment vendors, Bell Atlantic is prohibited from disclosing publicly the price paid for that equipment. In addition, the prices and terms of equipment purchases are confidential information that a competitor could use in purchasing its own equipment or pricing its own services. The number of lines served by each such device will also enable a competitor to determine how many digital service customers and lines Bell Atlantic has in service at each location in which it has installed a digital line carrier device. This will enable the competitor to target facility construction and marketing of competing digital services to areas where Bell Atlantic has the largest concentration of customers for such services.

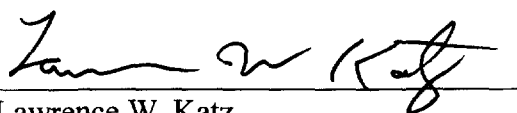
In addition, confidential treatment is requested of the revised data being submitted in response to Data Request Nos. 1, Loops, and 12, Digital Switches, for the reasons specified in Bell Atlantic's August 15, 1997 filing.

The confidential information is so marked and is being provided pursuant to the requirements of paragraph 8 of the Order. The public version, without the confidential information, is being filed pursuant to paragraphs 12 and 13 of the Order.

The attached data, and that filed on August 15, represent the best information that Bell Atlantic was able to develop in the short period of time afforded to respond to the extensive

data request. Some of the information is subject to revision, and revised data will be filed as soon as it is available.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Lawrence W. Katz", written over a horizontal line.

Lawrence W. Katz

Edward D. Young, III  
Betsy L. Roe  
Of Counsel

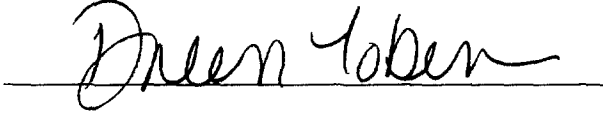
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Attorney for the Bell Atlantic  
Telephone Companies

September 12, 1997

DESIGNATION OF CONFIDENTIAL INFORMATION

I hereby certify that the information designated as confidential in the attached responses to the Universal Service Data Request is protected by Bell Atlantic as confidential or financial information:

SIGNATURE:   
TITLE: VP & CFO Network/Telecom  
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